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U.S. MAGISTRATE JUDGE



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U.S. MAGISTRATE JUDGE

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

STEVE HILL,

Defendant.

COMPLAINT

2:20-mj-00132-DJA

Magistrate No. \_\_\_\_\_

**VIOLATIONS:**

18 U.S.C. §§ 922(g)(1) and 924(a)(2) – Felon  
in Possession of a Firearm

**(UNDER SEAL)**

I, Special Agent James Brooks, the undersigned the undersigned Complainant, being duly sworn before a Magistrate Judge of the United States District Court for the District of Nevada, state the following is true and correct to the best of my knowledge and belief.

**I. Criminal Violations**

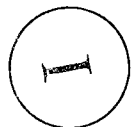
**COUNT ONE**

(Felon in Possession of a Firearm)

On or about January 6, 2020, in the State and Federal District of Nevada,

**STEVE HILL,**

the defendant herein, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: in the State of California; Assault With a



1 Deadly Weapon, in the Sacramento County Superior Court, on or about November 17, 1993, in  
2 cause No. 93F08085; in the State of Nevada: Possession of a Controlled Substance, in the 5th  
3 Judicial District Court, on or about August 28, 2002, in cause No. CR4011A; Trafficking in a  
4 Controlled Substance, and Stop Required on Signal of Police Officer, in the 8th Judicial District  
5 Court, on or about December 10, 2014, in cause No. C-14-301034-1: in the United States District  
6 Court—District of Nevada; Felon in Possession of a Firearm, on or about January 26, 2005, in cause  
7 No. 2:04-cr-0280-JCM-RJJ; Felon in Possession of a Firearm, on or about May 27, 2010, in cause  
8 No. 2:09-cr-0229-RCJ-GWF; Escape, on or about May 18, 2010, in cause No. 2:09-cr-00258-RLH-  
9 PAL, did knowingly possess a firearm, to wit: Glock model 21 .45 caliber handgun, bearing serial  
10 number MNU554, said possession being in and affecting interstate commerce and said firearm  
11 having been shipped and transported in interstate commerce, all in violation of Title 18, United  
12 States Code, Sections 922(g)(1) and 924(a)(2).  
13  
14

## 15 II. Statement of Essential Facts

16  
17 1. I, James S. Brooks, Special Agent of the Federal Bureau of Investigation (FBI),  
18 having been duly sworn, hereby depose and say:

19 2. I, James S. Brooks, an “investigative or law enforcement officer” of the United  
20 States, within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of  
21 the United States who is empowered by law to conduct investigations of and to make arrests for,  
22 offenses enumerated in Title 18, United States Code, Section 2516. I have been a Special Agent of  
23 the FBI since October 2017.  
24

25 3. I am currently assigned to the Las Vegas Field Office of the FBI where I am  
26 assigned to the Transnational Organized Crime Squad. More specifically, I focus on Criminal  
27 Enterprises that conduct traditional racketeering activities associated with organized crime  
28

1 including extortion, murder, kidnapping, illegal gambling, money laundering, prostitution, and  
2 drug trafficking. Additionally, I have participated in numerous search warrants and have  
3 previously investigated various crimes including, but not limited to, illegal gambling, drug  
4 trafficking, extortion, money laundering, financial fraud, and other offenses. I have conducted  
5 investigations of unlawful organized crime activity in violation of state and federal laws, and have  
6 reviewed records to obtain evidence in support of those violations.  
7

8 4. I have been involved in an investigation of Steve Hill (HILL), which is the subject of  
9 this Affidavit. I have personally spoken with investigating officers of the Nye County Sheriff's  
10 Office (NCSO) and reviewed reports regarding the investigation. I am familiar with all of the facts  
11 and circumstances surrounding the investigation. My training and experience as a Special Agent,  
12 including participation in this investigation, form the basis for opinions and conclusions set forth  
13 below.  
14

15 5. This summary is provided for purposes of demonstrating that there is probable  
16 cause to believe that the defendant has committed the crime described above.  
17

18 6. In early January 2020 NCSO received information from a confidential human  
19 source (CHS) who has previously been shown to be truthful and reliable that HILL—a multiple  
20 time convicted felon—was involved in narcotics activity and was in possession of firearms;  
21 including a black .45 caliber handgun equipped with a laser sight. HILL is well known to NCSO  
22 due to his extensive criminal history, felony investigations done by NCSO, and HILL having  
23 serving multiple terms of incarceration in both the Nevada Department of Corrections (NDOC),  
24 and the Federal Bureau of Prisons (BOP). HILL is known to be a high ranking member of the  
25 Outlaw Nazi Skinheads (ONS). ONS is a criminal gang that operates both in and outside of  
26  
27  
28

1 NDOC. ONS members are known to be involved in a variety of criminal activity including  
 2 narcotics trafficking, extortion, and acts of violence up to and including homicide.

3  
 4 7. HILL has the following prior felony convictions:

- 5 • Assault With a Deadly Weapon, in the Sacramento County Superior Court, on or  
 6 about November 17, 1993, in cause No. 93F08085.
- 7 • Trafficking in a Controlled Substance, and Stop Required on Signal of Police  
 8 Officer, in the 8th Judicial District Court, on or about December 10, 2014, in cause  
 9 No. C-14-301034-1. Hill was sentenced to 12-36 months NDOC.
- 10 • Possession of a Controlled Substance, in the 5th Judicial District Court, on or about  
 11 August 28, 2002, in cause No. CR4011A. Hill also pled guilty to two gross  
 12 misdemeanor counts of Unlawful Discharge of a Firearm. Hill was sentenced to 12-  
 34 months NDOC after a probation revocation.
- 13 • Felon in Possession of a Firearm, in the United States District Court- District of  
 14 Nevada, on or about January 26, 2005, in cause No. 2:04-cr-0280-JCM-RJJ. Hill  
 was sentenced to 36 months BOP.
- 15 • Felon in Possession of a Firearm, in the United States District Court- District of  
 16 Nevada, on or about May 27, 2010, in cause No. 2:09-cr-0229-RCJ-GWF. Hill was  
 17 sentenced to 90 months BOP.
- 18 • Escape, in the United States District Court- District of Nevada, on or about May 18,  
 19 2010, in cause No. 2:09-cr-00258-RLH-PAL. Hill was sentenced to 15 months BOP.

20 8. Due to the information received from the CHS that Hill was armed, NCSO  
 21 detective and deputies immediately began to look for HILL. On January 6, 2020 HILL was  
 22 spotted driving a pickup in the area of Pahrump, Nevada and was pulled over for an inoperable  
 23 tail-lamp. While conversing with NCSO deputies HILL admitted he had multiple felony priors  
 24 and had recently come off "paper" after serving a federal prison sentence.

25  
 26 9. HILL was asked to step out his vehicle, and deputies performed a pat-down for  
 27 weapons. On HILL'S right hip in a holster, deputies discovered a Glock model 21 .45 caliber  
 28 pistol equipped with a laser sight. The pistol was loaded with a round chambered, and HILL had


1 two additional loaded magazines of .45 caliber ammunition in a carrier on his left hip. When  
2 asked if was in possession of anything else deputies should know about, HILL replied, "lawyer."

3 10. A NCSO certified narcotics detection K9 was on scene, and was deployed to do an  
4 open air sniff on HILL'S vehicle. The K9 gave a positive alert near the driver's side door. The  
5 truck cab was searched, and a glove was located in the center console. Hidden within the glove  
6 were two baggies. One baggie contained approximately seven grams of a crystalline substance,  
7 and the other contained approximately three grams of a crystalline substance. Both later tested  
8 positive for the presence of methamphetamine.  
9

10 11. I arranged to have the Glock .45 caliber handgun inspected by an agent from the  
11 Bureau of Alcohol Tobacco Firearms and Explosives. The agent determined the Glock was not  
12 produced in the State of Nevada and was shipped and transported in interstate commerce.  
13

### 14 III. Conclusion

15 Based upon the forgoing facts, I respectfully submit there is probable cause to believe that  
16 Hill did unlawfully a possess a firearm, in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).  
17

18  
19   
20 James Brooks, Special Agent  
21 Federal Bureau of Investigation

22  
23 Subscribed and sworn to before me this 14<sup>th</sup> day of February, 2020.

24  
25 

26 HONORABLE DANIEL J. ALBREGTS  
27 UNITED STATES MAGISTRATE JUDGE  
28